

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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03-MDL-1570 (GBD)(SN)

In re:  
TERRORIST ATTACKS ON SEPTEMBER 11, 2001

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SAUDI ARABIA  
FIRST NOTICE OF  
AMENDMENT

This document relates to: Leftt et. al. v. Kingdom of Saudi Arabia-----

No. 18-CV-03353-----

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 18-CV-03353 as permitted and approved by the Court's Order of October 28, 2019, ECF No 5234. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Kingdom of Saudi Arabia. The underlying Complaint is deemed amended to include the factual allegations, jurisdictional allegations, and jury trial demand, as indicated below, of (a) the Consolidated Amended Complaint as to the Kingdom of Saudi Arabia, ECF No. 3463, or (b) the Complaint Against the Kingdom of Saudi Arabia, Ashton v. Kingdom of Saudi Arabia, No. 17-CV-2003 (GBD)(SN) (S.D.N.Y. Mar. 30, 2017), ECF No. 1, as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Kingdom of Saudi Arabia and does not apply to any other defendant.

Upon filing this Saudi Arabia Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all prior filings in connection with that complaint; and all prior Orders and

rulings of the Court in connection with that complaint.

### CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference the following factual allegations, jurisdictional allegations, and jury trial demand in the following complaint

[**check only one complaint**] and the following causes of action set forth in that complaint:

**☒ Consolidated Amended Complaint as to the Kingdom of Saudi Arabia, ECF No. 3463 (check all causes of action that apply)**

- ☒ COUNT I - Aiding and Abetting and Conspiring with Al Qaeda to Commit the September 11th Attacks upon the United States in violation of 18 U.S.C. § 2333(d) (JASTA).
- ☒ COUNT II - Aiding and Abetting and Conspiring with Al Qaeda to Commit the September 11th Attacks upon the United States in violation of 18 U.S.C. § 2333(a).
- ☒ COUNT III - Committing Acts of International Terrorism in violation of 18 U.S.C. § 2333.
- ☒ COUNT IV - Wrongful Death.
- ☒ COUNT VI - Alien Tort Claims Act.
- ☒ COUNT VII - Assault and Battery.
- ☒ COUNT VIII - Conspiracy.
- ☒ COUNT IX - Aiding and Abetting.
- ☒ COUNT X - Intentional Infliction of Emotional Distress.
- ☒ COUNT XII - Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Supervising Employees and Agents.
- ☒ COUNT XIII - Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Hiring, Selecting, and Retaining Employees and Agents.

☒ COUNT XIV - 18 U.S.C. § 1962(a)--(d)-CIVIL RICO.

☒ COUNT XV - Trespass.

☒ COUNT XVI - Violations of International Law.

☐ **Complaint Against the Kingdom of Saudi Arabia, Ashton v. Kingdom of Saudi Arabia, No. 17-CV-2003 (GBD)(SN) (S.D.N.Y. Mar. 30, 2017), ECF No. 1 (check all causes of action that apply)**

- ☐ First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)
- ☐ First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)
- ☐ Second Cause of Action for Wrongful Death Damages Pursuant to State Tort Law
- ☐ Second Cause of Action for Personal Injury Damages Pursuant to State Tort Law
- ☐ Third Cause of Action for Wrongful Death Damages Pursuant to the Alien Tort Claims Act
- ☐ Third Cause of Action for Personal Injury Damages Pursuant to the Alien Tort Claims Act

## IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>New Plaintiff's Name Name (alphabetical by last name)</b>	<b>New Plaintiff's State of Residency at Filing (or death)</b>	<b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent/Vict im</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>	<b>Nature of Claim (wrongful death, solatium, personal injury)</b>
1	Michael Altman Individually as and as the Representative of the Estate of Lisa Altman	N.Y	US	Lisa Altman	Husband	18-cv-3353 ECF No. 8 Appendix 1 ¶ 13	Wrongful Death-Solatum
2	John E. Bonsignore III	N.Y	US	John E. Bonsignore III	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 9	Personal Injury
3	James Chan Individually and as the Respresentative of the Estate of Beili Zheng	N.Y	US	Beili Zheng	Husband	18-cv-3353 ECF No. 8 Appendix 1 ¶ 7	Wrongful Death-Solatum
4	Michael Cipparulo	N.Y	US	Micahel Cipparulo	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 14	Personal Injury
5	Franz Edwards	N.Y	US	Franz Edwards	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 4	Personal Injury
6	Jean Elie	N.Y	US	Jean Elie	Self	18-cv-3353	Personal Injury



						ECF No. 8 Appendix 1 ¶ 8	
7	Lawrence Frasca	N.Y	US	Lawrence Frasca	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 10	Personal Injury
8	Fred Golba	N.Y	US	Fred Golba	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 5	Personal Injury
9	Andrew Leftt	N.Y	US	Andrew Leftt	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 1	Personal Injury
10	Moisey Lerner	N.Y	US	Moisey Lerner	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 16	Personal Injury
11	Vivian Lomacang	N.Y	US	Vivian Lomacang	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 20	Personal Injury
12	Jill Massa, Individually and as the Representative of the Estate of Louis Massa	N.Y	US	Louis Massa	Wife	18-cv-3353 ECF No. 8 Appendix 1 ¶ 11	Wrongful Death-Solatium
13	Edward McConnin	N.Y	US	Edward McConnin	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 2	Personal Injury
14	Eugene Milanesi	N.Y	US	Eugene Milanesi	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 3	Personal Injury
15	George Napakh	N.Y	US	George Napakh	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 6	Personal Injury
16	Lyudmila Napakh	N.Y	US	Lyudmila Napakh	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 12	Personal Injury
17	William G. Nelson	N.Y	US	William G. Nelson	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 21	Personal Injury

18	Svetlana Roy	N.Y	US	Svetlana Roy	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 19	Personal Injury
19	Robert Watman	N.Y	US	Robert Watman	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 18	Personal Injury
20	Michael Zemelman Individually, and as the Representative of the Estate for Raisa Zemelman	N.Y	US	Raisa Zemelman	Husband	18-cv-3353 ECF No. 8 Appendix 1 ¶ 17	Wrongful Death-Solatium
21	Michael Zemelman	N.Y	US	Michael Zemelman	Self	18-cv-3353 ECF No. 8 Appendix 1 ¶ 15	Personal Injury

Dated: June 16, 2023 .....

Respectfully submitted,



COUNSEL FOR PLAINTIFFS